

REMARKS:Status

Claims 31 to 38, 40 to 50, and 57 to 60 are pending. Claims 31, 43, and 60 are amended herein. Claims 31 and 43 are the independent claims. Entry of this response, reconsideration and further examination are respectfully requested.

Claim Objection

The Office Action objected to claim 60 for an informality, which has been corrected herein. Withdrawal of this objection is respectfully requested.

Claim Rejections

All pending claims were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 5,761,669 (Montague) over U.s. Patent No. 5,452,447 (Nelson).

Claim 31 has been amended to read as follows:

31. A method of operating a file server, said method including steps of:

identifying a file on said file server as using a first security style selected from among a plurality of security styles corresponding to a plurality of security styles implemented on said file server; and

mapping access control limits in another one of said plurality of security styles into said first security style, wherein said mapping includes static and dynamic mapping, with static mapping for validation of said access control limits for said file and with dynamic mapping for reading or modification of said access control limits for said file.

The applied art is not seen by Applicants to disclose or to suggest the foregoing features of claim 31, at least with respect to the feature that mapping of access control limits “includes static and dynamic mapping.” In particular, neither of the applied references appears to disclose or to suggest combining both of these types of mapping. Rather, each of the references was cited for teaching one of these types of mapping.

In more detail, the inventors recognized that static mapping is better in some cases, whereas dynamic mapping is better in other cases. Thus, the application discloses using both types of mapping. This is a significant departure from using one type of mapping or the other, as appears to be used by the applied art.

Applicants realize that the Examiner is combining the teachings of the references. However, Applicants respectfully submit that the mere fact that one reference teaches dynamic mapping while another reference teaches static mapping is not sufficient to render obvious the combination of both types of mapping. Rather, Applicants submit that some suggestion for combining the types of mapping must be present for the combination to be obvious.

Neither Montague nor Nelson provides any suggestion or motivation for combining both static and dynamic mapping of access control limits. In this regard, the Office Action states the following:

It would have been obvious to one of ordinary skill in the art to allow for static mapping of access permission as taught by Nelson. One would be motivated to do so because static mapping allows a file server to cache access permissions in order to conserve network bandwidth (col. 4, lines 10-20).

Applicants respectfully point out that this motivation, by its own terms, is one “to allow for static mapping.” That is entirely different from using static mapping along with dynamic mapping. In fact, by this reasoning, dynamic mapping should not be used because it does not conserve network bandwidth. Thus, this motivation actually can be interpreted as teaching against use of dynamic mapping, which of course teaches against use of dynamic mapping along with static mapping.

Furthermore, Applicants are unaware of any such suggestion or motivation in the prior art in general.

In view of the foregoing, Applicants respectfully submit that claim 31, which now explicitly recites that mapping for access control limits “includes static and dynamic mapping,” is allowable over Montague and Nelson. Withdrawal is therefore respectfully requested of the § 103(a) rejection of this claim and its dependent claims over these references.

Independent claim 43 also recites the feature that mapping of access control limits “includes static and dynamic mapping.” Accordingly, withdrawal is also respectfully requested of the § 103(a) rejection of claim 43 and its dependent claims over Montague and Nelson.

#### No Admission

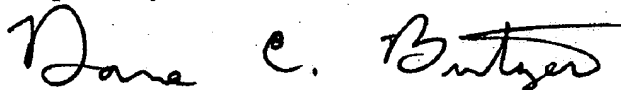
Applicants’ decision not to argue each of the dependent claims separately is not an admission that the subject matter of those claims is taught by the applied art.

Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at (614) 205-3241. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane C. Butzer". The signature is fluid and cursive, with the first name "Dane" being the most prominent.

Dane C. Butzer  
Reg. No. 43,521

Dated: January 11, 2006

Swernofsky Law Group PC  
P.O. Box 390013  
Mountain View, CA 94039-0013  
(650) 947-0700